

Message

From: Strum, Madeleine [Strum.Madeleine@epa.gov]
Sent: 6/27/2017 11:57:36 PM
To: Danielle Nesvacil [danielle.nesvacil@tceq.texas.gov]
CC: Parker, Cindy [parker.cindy@epa.gov]; Madden, Joshua [madden.joshua@epa.gov]; Adam Bullock [adam.bullock@tceq.texas.gov]
Subject: RE: NATA Review

Danielle

I made the benzidine change. I will tagged out the benzidine data in the 2014 NEI v1 so that it will not be used in the v2. Here is my tagging comment: **"NATA Change-per Brenda Shine, stack test was below detection and 1/2 detection limit was used. Agreed on by Danielle Nesvacil <danielle.nesvacil@tceq.texas.gov> "**

Nonpoint and comments on the v1 tract risks are due Aug 11. EtO was due June 1 but I still need your review on the "priority" facilities – as soon as possible. Since we still have a few outstanding facilities (Texas EtO) that have not yet been reviewed, we developed a priority list of point sources and I put them on the SharePoint site (they are in the data library-- https://usepa.sharepoint.com/sites/oar_Work/NATAREVIEW/2014%20NATA-%20Tract%20Risk%20Review/Data/Priority%20Facility%20List%20based%20on%20tract%20risk.xlsx?d=wf75d0016720b45deac34508675f6f362). I've asked Cindy about them but I know she is out of the office so I put them in the earlier email I sent to you.

Please let me know if you have EtO changes for these high priority facilities as soon as possible since I need to finish up the point changes for the NEI v2.

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711
Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Danielle Nesvacil [mailto:danielle.nesvacil@tceq.texas.gov]
Sent: Tuesday, June 27, 2017 5:49 PM
To: Strum, Madeleine <Strum.Madeleine@epa.gov>
Cc: Parker, Cindy <parker.cindy@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>; Adam Bullock <adam.bullock@tceq.texas.gov>
Subject: Re: NATA Review

Hi Madeleine--

Thanks for your email. I don't have access to change those emissions in EIS, I need to work with our database administrator, Adam Bullock (cc'd), to accomplish that. We'll start looking into it ASAP and keep you updated.

I was under the impression that the EtO revisions were due Aug 11-- am I way off base? I'm still working these due to covering for co-workers who are out for various reasons.

Let me know if you need anything from me sooner related to either of the above issues or another issue.

Thanks,
Danielle

From: Strum, Madeleine <Strum.Madeleine@epa.gov>

Sent: Tuesday, June 27, 2017 1:55 PM

To: Danielle Nesvacil

Cc: Parker, Cindy; Madden, Joshua

Subject: FW: NATA Review

Hi Danielle

Per the below the engineers working on rules indicate that the benzidine emissions were based on ½ the Detection Limit. Therefore I propose to remove them. Could you remove from your database?

The other priority facilities that we haven't heard back from you are below. Had you gotten back with Cindy or Joshua on these?

State	EPA Region	County	FIPS	Tract	Population	TRACT PT-StationaryPoint Cancer Risk (per million)	Driver Facility	State Reviewed Data? (Y/N) 5/15/17 version	Change Submitted ? (Y/N)	NOTES	State or Tribe	FIPS	County	EIS
TX	EPA Region 6	Jefferson	48245	48245010902	4592	237.754	4945211				Texas	48245	Jefferson	49
TX	EPA Region 6	Harrison	48203	48203020604	3622	135.344	4941511				Texas	48203	Harrison	49
TX	EPA Region 6	Harris	48201	48201451700	3407	75	3736811				Texas	48201	Harris	37
TX	EPA Region 6	Harris	48201	48201451700	3407	75	4057911				Texas	48201	Harris	40
TX	EPA Region 6	Harris	48201	48201451700	3407	75	4941411				Texas	48201	Harris	49

Thanks

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711

Office of Air Quality Planning and Standards | Air Quality Assessment Division | Emission Inventory and Analysis Group | 919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

From: Palma, Ted
Sent: Tuesday, June 27, 2017 10:03 AM
To: Shrager, Brian <Shrager.Brian@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>
Cc: Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>; Strum, Madeleine <Strum.Madeleine@epa.gov>
Subject: RE: NATA Review

Makes perfect sense to remove the benzidine for this facility. I will have Madeline work with TX to have it removed from there NEI V2 and thus remove it from the public release of NATA
Ted

Ted Palma
USEPA
OAQPS/HEID/ATAG
MD C539-02
RTP, NC 27711

919-541-5470 (work)
palma.ted@epa.gov

From: Shrager, Brian
Sent: Friday, June 16, 2017 9:10 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>; Palma, Ted <Palma.Ted@epa.gov>
Cc: Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>
Subject: RE: NATA Review

With all tests being BDL, at least within EPA programs that I've worked on (emission factors, inventories, and reg. development), we set those emissions at zero since there is no indication that the pollutant is emitted. I think it is worth the NATA checking in with Texas regarding these emissions, but perhaps this issue is already being vetted? Ted?

Stepping back, the issue with NATA is that the emissions are being reported to NEI by the states, and their conventions may not match ours. The good news is that we have a NATA review process before NATA is released, and issues such as this will hopefully be identified. To the extent that a number that is based on a non-detect ends up being of consequence, the review process is designed to dig deeper to see if risks identified are real or not.

I think Ted may be gone for the next week or so, so we may have to wait until the week after next for resolution.

Thanks!

Brian

From: Shine, Brenda
Sent: Friday, June 16, 2017 8:40 AM
To: Shrager, Brian <Shrager.Brian@epa.gov>; Palma, Ted <Palma.Ted@epa.gov>

Cc: Bouchard, Andrew <Bouchard.Andrew@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>

Subject: FW: NATA Review

Hi Guys—

Just wanted to make you aware of what I'm seeing in the NATA v1 results—having recently done the Refinery RTR, I was interested in how the NATA results would compare; further, as part of our groups QA of emission data for the chemical sector source categories, many of which are collocated at Refineries, had access to the disaggregated NATA risk results where I found some refineries that were considerably over 100/million; the highest was ExxonMobil in Baytown, Tx, which wouldn't surprise anyone, but most of the risk, 343/410, in a million was attributed to benzidine from fugitive or miscellaneous sources;

The benzidine was in the inventory based on stack tests from the 2011 ICR that were **below the method detection limit** for benzidine but being conservative they reported levels of benzidine at half the detection limit.

We decided in the Refinery RTR process not to model pollutants that were BDL if they were not present in any tests above BDL. I had several conversations with Brian about this but it seems like this issue probably won't go away and I wonder if we could make sure our policy is sound and consistent on how we treat highly toxic compounds flagged below detection. I think Andrew is also asking similar questions in Ethylene. I wonder because it seems like the convention for inventories and reporting may be different than the convention for risk modeling.

So bottom line, are you guys aware of a definite policy with respect to the treatment of highly toxic compounds that are shown to be BDL or can we at least make sure we're on the same page.

From: Jones, John-L

Sent: Thursday, June 15, 2017 2:57 PM

To: Shine, Brenda <Shine.Brenda@epa.gov>

Cc: Palma, Ted <Palma.Ted@epa.gov>

Subject: RE: NATA Review

The company is tracking down the details but the sources (that were tested) are most likely: the DCU (delayed Coker unit) and the SCU (Sulfur conversion complex) which is what EM calls the sulfur recovery unit/plant.

I will let you know as soon as they get back to me with more information.

John L. Jones

Air Enforcement Section

6EN-AA

214-665-7233

From: Shine, Brenda

Sent: Thursday, June 15, 2017 1:06 PM

To: Jones, John-L <jones.john-l@epa.gov>

Cc: Palma, Ted <Palma.Ted@epa.gov>

Subject: RE: NATA Review

But it's not being reported from a source that was stack tested; it is reported as a fugitive/miscellaneous source. Can she tell us what source they stack tested?

From: Jones, John-L
Sent: Thursday, June 15, 2017 1:55 PM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Cc: Palma, Ted <Palma.Ted@epa.gov>
Subject: RE: NATA Review

Hi Brenda:

After you told me where to look, I cut a portion of the NATA report and sent it to Diane Otto at EM Baytown; that helped her track down the source of the benzidine data used in the emission number.

The benzidine data comes from the second stage to the 2011 ICR (as Diane calls it the 114 from OAQPS); it's the result from follow-up testing EM did as part of the questions in the ICR.

Their testing data results were **below the method detection limit** for benzidine but being conservative they reported levels of benzidine **at half the detection limit**.

I hope this is helpful.

John L. Jones
Air Enforcement Section
6EN-AA
214-665-7233

From: Shine, Brenda
Sent: Thursday, June 15, 2017 10:32 AM
To: Jones, John-L <jones.john-l@epa.gov>
Cc: Palma, Ted <Palma.Ted@epa.gov>
Subject: RE: NATA Review

This is the NATA run, so I believe it came from the national emission inventory v1 and not a response to a 114. It was not in the Refinery ICR 114 conducted in 2011. Ted can verify but he may be out today. It might have to wait until he comes back.

From: Jones, John-L
Sent: Thursday, June 15, 2017 11:29 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: FW: NATA Review

Hi Brenda:

I was asked to look at the benzidine issue (raised in your email below) at ExxonMobil Baytown. I spoke to Diane Otto at the refinery to see if she could shed some light on the source(s). Diane is looking into it now. Based on my conversation with her it would be helpful for me to have the source document for the benzidine fugitive emissions; e.g. was it an emission inventory or a response to a 114? Additionally I was thinking that it may be originating at the olefins plant at the ExxonMobil Chemical Plant with is part of the Baytown complex.

John L. Jones
Air Enforcement Section

6EN-AA
214-665-7233

From: Jones, John-L
Sent: Thursday, June 15, 2017 9:41 AM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Larson, Darrin <Larson.Darrin@epa.gov>
Subject: RE: NATA Review

Hi Margaret:

I spoke to Diane Otto at the ExxonMobil Refinery in Baytown. She will try to find out where the benzidine reporting is coming from. It could be the refinery or the Chemical Plant ?; or is RTP positive it's from the refinery?

It would be helpful if we had the document that RTP is using as a basis.

John L. Jones
Air Enforcement Section
6EN-AA
214-665-7233

From: Osbourne, Margaret
Sent: Wednesday, June 14, 2017 4:25 PM
To: Jones, John-L <jones.john-l@epa.gov>
Cc: Larson, Darrin <Larson.Darrin@epa.gov>
Subject: FW: NATA Review

Hi John:

Can we talk about this tomorrow? With your expertise in the R6 refineries, I thought you may have an idea of the benzidine at ExMob Baytown – see emails below.

Thanks,
Margaret

Margaret Osbourne
Chief, Air Toxics Enforcement Section
Compliance Assurance & Enforcement Division
EPA Region 6
1445 Ross Avenue (6EN-AT)
Dallas, TX 75202
214-665-6508

From: Verhalen, Frances
Sent: Wednesday, June 14, 2017 1:30 PM
To: Osbourne, Margaret <osbourne.margaret@epa.gov>
Cc: Parker, Cindy <parker.cindy@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>
Subject: FW: NATA Review

Margaret, as we discussed, I will ask Cindy to coordinate information transfer with you and you will share it with Darrin and assigned staff.

Below is the note from Brenda Shine about the benzidine at ExxonMobil Baytown. Cindy or Josh can coordinate with TCEQ to confirm the reality of the emission but I would appreciate some assistance in understanding the likely sources for this.

Thank you.

Frances Verhalen, P.E., Chief
Air Monitoring/Grants Section
US Environmental Protection Agency
1445 Ross Avenue (MC 6MM-AM)
Dallas, TX 75202
214-665-2172
verhalen.frances@epa.gov

From: Shine, Brenda
Sent: Wednesday, June 14, 2017 12:56 PM
To: Verhalen, Frances <verhalen.frances@epa.gov>
Cc: Palma, Ted <Palma.Ted@epa.gov>
Subject: NATA Review

Hello Frances,

I was looking at some of the NATAv1 information and I noticed that one refinery (Exxon Mobil, Baytown, Texas) had a particularly high risk value (410 in a million)—of which 343/410 --- 84% of the high MIR is attributed to benzidine from fugitive or miscellaneous sources; I worked on the recently completed Refinery RTTR and I know that there was no benzidine reported from this facility during the refinery RTR process or the 2011 information collection request. Further, we tested for it from cat crackers and found all results below detection; I'd like to flag this value for you as you work with states to conduct the NATA review to see if it is real. I can tell you that one facility reported benzidine in the 2011 ICR (Exxon Baton Rouge) from catalytic reformer vent. Although we modeled this emission, we also tested for it in catalytic reformers and also found it to be below detection limits.

Thanks. If you have any questions let me know. I'm at 919 541 3608.